

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

William Scott v. Jaison Mikelonis, et al.

Scott · No. 2:25-cv-00031-CB-KT · Decided March 2, 2026

SUMMARY

The United States District Court for the Western District of Pennsylvania dismissed William Scott’s case with prejudice as a sanction for fabricating a purported court order and submitting it to the Department of Corrections. The court concluded that dismissal was warranted under its inherent authority after considering the Poulis factors and the integrity of the judicial system.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania
WRITING FOR THE COURT	Cathy Bissoon
JURISDICTION	United States District Court for the Western District of Pennsylvania
DECIDED	March 2, 2026
DOCKET	2:25-cv-00031-CB-KT
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court dismissed Plaintiff's civil action with prejudice as an inherent-authority sanction after determining that he fabricated a court order and submitted the purported order to the Department of Corrections.
STANDARD OF REVIEW	The Court rejected Plaintiff's denials under a preponderance-of-the-evidence standard and exercised its inherent authority to impose sanctions. The opinion also considered the Poulis factors governing dismissal sanctions.
PRECEDENTIAL VALUE	unpublished district court memorandum and order; persuasive only
PARTIES	William Scott v. Jaison Mikelonis, et al.

TOPICS

- sanctions
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the Court could dismiss the action with prejudice under its inherent authority as a sanction for fabricating and transmitting a court order.
2. Whether Plaintiff's conduct warranted dismissal after consideration of the Poulis factors and the availability of alternative sanctions.
3. Whether the same result would follow under Federal Rule of Civil Procedure 11.

HOLDINGS

1. Fabricating a court order and attributing it to the Court is sufficiently egregious misconduct to warrant dismissal with prejudice as an exercise of the Court's inherent authority to sanction.
2. The Poulis factors supported dismissal because Plaintiff bore the greatest possible personal responsibility, his conduct prejudiced the judicial system and court integrity, his conduct was willful, monetary sanctions would be ineffective, and the remaining factors were neutral or immaterial in light of the fraud.
3. The Court concluded that the result would be the same under Federal Rule of Civil Procedure 11, although it imposed dismissal pursuant to its inherent authority.

KEY QUOTATIONS

“Although dismissal is a severe sanction, reserved for the worst of offenses, fabricating court orders qualifies.”

“To protect the integrity of the legal system, then, the Court’s reaction must be swift and harsh.”

“Plaintiff’s case is DISMISSED WITH PREJUDICE.”

FACTUAL BACKGROUND

Plaintiff transmitted to the Department of Corrections a purported notice of electronic filing summarizing a nonexistent order that would have temporarily terminated or canceled deductions for his filing fees. He admitted submitting the document but claimed that it had arrived in his legal mail and that he did not know it was fabricated. The Court found that the document reproduced court and docket information accessible primarily to Plaintiff, the lawyers, their staff, and the Court, and that Plaintiff's account was not credible, particularly because correspondence records showed he had not received legal mail during the relevant period.

PROCEDURAL HISTORY

The Magistrate Judge issued a show-cause order requiring Plaintiff to explain why sanctions should not be imposed after the Court learned that he transmitted a fabricated notice of electronic filing purporting to memorialize a nonexistent order suspending or canceling filing-fee payments. Plaintiff admitted submitting the document but denied knowing it was fake. After considering his response and the City Defendants' evidence, the Court dismissed the case with prejudice.

DISPOSITION

dismissed

CASES CITED

- *Stafford v. Derosé*, 2015 WL 1499833, at *2-5 (M.D. Pa. Apr. 1, 2015)
- *Martin v. Redden*, 34 F.4th 564, 568-69 (7th Cir. 2022)
- *Amfosakyi v. Frito Lay, Inc.*, 496 F. App'x 218, 225 (3d Cir. Sept. 12, 2012)
- *Poulis v. State Farm Fire & Cas. Co.*, 747 F.2d 863 (3d Cir. 1984)

OPINION

SCOTT

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WILLIAM SCOTT,)

) Plaintiff,) 2:25-cv-00031-CB-KT) v.) Chief Judge Cathy Bissoon) Magistrate Judge Kezia O.
L. Taylor JAISON MIKELONIS, et al.,)) Defendants.)

MEMORANDUM AND ORDER

I. MEMORANDUM

This case will be dismissed, with prejudice, as a sanction for Plaintiff's fabrication of a court order.¹ Plaintiff transmitted to the DOC a purported NEF² summary, memorializing a nonexistent order directing that payments of his filing fee were "temporarily terminate[d] or cancel[led]." Doc. 61-1. When the Magistrate Judge learned what happened, she ordered Plaintiff to show cause why sanctions should not be imposed. Doc. 61. Plaintiff's Response fails the purpose. Plaintiff acknowledges submitting the fake document, but claims he was unaware that it was fake. Doc. 71. He claims to have received the document "through and in the form of legal mail." Although the fabricated document purports to address a Report & Recommendation ("R&R"), its contents, if issued by the Court, would appear in an order. As often is the case, the forger lacked sufficient acumen to make a convincing imitation. ² Notice of Electronic Filing, as utilized in the Court's CM/ECF system. mail"—but offers no explanations regarding the identity of the fabricator or why someone would do such a thing. See *id.* In reply, the City Defendants have supplied Plaintiff's Inmate Correspondence History, revealing that he did not receive "legal mail" during the operative time frame. Doc. 72 and 72-1. The Court is unsurprised, because Plaintiff's narrative is fairly ridiculous. The only person having an interest in whether filing fees are deducted from Plaintiff's inmate account is Plaintiff. The only persons with ready access to the information mimicked in the false document – the NEF format, case information and NEF-recipients list, which includes support staff not identified in the docket – are Plaintiff, the lawyers, their support staff and the

Court. Details regarding the “control number” procedures, applicable to “legal mail” in the prison system, similarly are outside common knowledge. Disinterested individuals would not know the number to put on a control sticker, if they knew such a thing existed. Plaintiff offers no credible explanations, because none exist. Motive and opportunity were uniquely his. Plaintiff knows what NEFs look like, multiple text-only Court documents have been served on him in the same format. As luck would have it, a legitimate R&R was entered on October 2, 2025. Doc. 59. The majority of its NEF-contents are materially similar or identical to the false document. All that would be required to falsify a document, using the prior NEF as a template, is access to PACER, a word-processing application and rudimentary knowledge of its capabilities.³ That and “mischievous” intent (a characterization that is charitable, to a fault). ³ In saying Plaintiff fabricated the document, the Court means he or someone associated with him. It is not hard to imagine that he had “help,” only that the document mysteriously appeared in his “legal mail” in ways unbeknownst to him. Unfortunately, barriers of entry to the falsification of court orders are low, and our growing reliance on digital technology has only increased the opportunities. In light of these realities, the legal system relies on litigants knowing better than to “go there,” given the severity of the consequences. To protect the integrity of the legal system, then, the Court’s reaction must be swift and harsh. Although dismissal is a severe sanction, reserved for the worst of offenses, fabricating court orders qualifies. *Stafford v. Derosé*, 2015 WL 1499833, *2-5 (M.D. Pa. Apr. 1, 2015) (a court must “consider not only the prejudice to the litigants, but also the impact of the fraudulent conduct on the judicial system and the threat it poses to the integrity of the court”) (all quotations cleaned up, and citations omitted, here and hereafter); *Martin v. Redden*, 34 F.4th 564, 568-69 (7th Cir. 2022) (the “severe sanction[]” of dismissal was warranted, because “[p]erjury is among the worst kinds of misconduct,” and “[n]o one [should] need[] to be warned not to lie to the court”); see also, e.g., *Amfosakyi v. Frito Lay, Inc.*, 496 Fed.Appx. 218, 225 (3d Cir. Sept. 12, 2012) (“[s]imply put, a litigant who provides false documentation” in “an improper attempt to influence the outcome” of civil litigation “may be prohibited . . . from proceeding”) (unpublished decision, persuasive authority only). Passage after passage in the above-cited cases emphasize the corrosive effects of similar misconduct on our justice system. Considering that the fabricated document was attributed to the Court, the need for strong rebuke is even more acute. *Stafford* at *5 (“any sanction short of dismissal may be inherently inadequate to remedy the harm to the public interest in preserving the integrity of the courts, and in deterring future misconduct”). Plaintiff is fortunate that his consequences will be limited to this case. See *Martin*, 34 F.4th at 568-69 (affirming a two-year filing ban, for less egregious conduct). The factors addressed in *Poulis v. State Farm Fire & Cas. Co.*, 747 F.2d 863 (3d Cir. 1984) are in line. Plaintiff’s personal responsibility (factor 1) could not be greater. Nor the prejudice, to the judicial system and the integrity of the courts (factor 2). Plaintiff’s conduct was willful (factor 4), and his denials, and pleas for mercy, ring hollow.⁴ History of delay (factor 3) and the meritoriousness of his claims (factor 6) are neutral and, in the undersigned’s view, beside the point. As to alternative punishment

(factor 5), monetary sanctions would be ineffective, given Plaintiff's litigation status (an incarcerated person, proceeding IFP). Stafford at *5 As explained above, moreover, a clear message must be sent: impersonating the Court is never "on the table." It will end badly, and the only question is, how badly. Plaintiff should be grateful that additional consequences will not be initiated by the Court. Cf. Doc. 64 (summarizing numerous state and federal criminal laws with which Plaintiff might be charged, but deferring to the Court on whether to report the conduct to law enforcement – a step the undersigned has determined is unnecessary). Consistent with the foregoing, the Court hereby enters the following: 4 While Plaintiff's regret for his consequences appears genuine, the more he tries to evade them the deeper the hole he digs. His response claims that a DOC hearing examiner endorsed his narrative. Doc. 71 at ¶¶ 5-6. Not so. The examiner's report acknowledges Plaintiff's narrative, and attributes it to Plaintiff—which explains the use of quotation marks. Doc. 71-1 (inmate "states: 'I plead guilty to contraband since I did have forged documents. I did not know they were forged though.'"). Although Plaintiff may mistake his positions for advocacy, they are, in fact, somewhat insulting of the Court's intelligence. The undersigned does not mean so personally, and lawyers at times have been known to do the same. To close the circle: the hearing examiner's acceptance of Plaintiff's voluntary admission of guilt on a disciplinary charge, which resulted in a sentence of 60 days in disciplinary custody, cannot be read to show that the examiner found Plaintiff's version credible, or that he was "innocent" of other charges.

II. ORDER

Plaintiff's case is DISMISSED WITH PREJUDICE.⁵ March 2, 2026 s/Cathy Bissoon Cathy Bissoon Chief United States District Judge cc (via First-Class U.S. Mail): William Scott 65790510 NEOCC

2240 Hubbard Road Youngstown, OH 44505 cc (via ECF email notification): All Counsel of Record 5 Dismissal is made pursuant to the Court's inherent authority to sanction. As to Rule 11, court-forgeries, on their face, are hard to categorize. They rarely (if ever) are presented to the court as a "pleading, written motion or other paper." Fed. R. Civ. P. 11(a). Plaintiff's denials, which the undersigned has rejected under a preponderance of the evidence standard, were made in his response to the SCO, which is governed by Rule 11. Emphasizing a second deception, made to cover a first one, adds complication without benefit. Given the law's preference for Rules-based sanctions, however, the Court notes that its result would be the same either way.